

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHICAGOANS FOR AN END TO THE)
GANG DATABASE: BLACK YOUTH)
PROJECT 100 CHICAGO, BLOCKS)
TOGETHER, BRIGHTON PARK)
NEIGHBORHOOD COUNCIL, LATINO)
UNION, MIJENTE, and ORGANIZED)
COMMUNITIES AGAINST DEPORTATION,)
as well as DONTA LUCAS, JONATHAN)
WARNER, LESTER COOPER, and LUIS)
PEDROTE-SALINAS, on behalf of themselves)
and a class of similarly situated persons,)

Plaintiffs,

v.

CITY OF CHICAGO, SUPERINTENDENT)
EDDIE JOHNSON, and CHICAGO POLICE)
OFFICERS MICHAEL TOMASO (#6404),)
MICHAEL GOLDEN (#15478), PETER)
TOLEDO (#2105), JOHN DOES 1-4, and)
JANE DOES 1-2,)

Defendants.

Case No.18cv4242
(Class Action)
Hon. Andrea R. Wood

Declaration of Brendan Shiller

I, Brendan Shiller, counsel for Plaintiffs in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am the managing partner of the Shiller Preyar Law Offices and am the President of the Board for the West Side Justice Center. I submit this declaration in support of the Plaintiffs' motion for class certification.
2. I have been the managing partner of Shiller Preyar Law Offices since 2010. During that time SPLO has filed and litigated more than 150 federal civil rights cases in federal court and another 4 in state court. I have been the lead or supervising attorney on all of

those cases.

3. In 2010 I was the supervising attorney on a class action filed against the Village of Palos Hills for its practice of recording jailed women as they go to the bathroom. See *Harrison v. Madigan, et. al.*, 10-cv-03425 (ND ILL) (St. Eve, j.). That case resulted in a class settlement for more than 90 plaintiffs.
4. From November of 2003 until 2010 I was the owner of Shiller Law Offices which also specialized in civil rights and criminal defense. All told, I have appeared in more than 280 federal cases and another 700 state civil and criminal cases. I have participated in more than 30 jury trials and more than 100 bench trials and motion hearings.
5. In addition to Section 1983, I have done federal work on dozens of federal criminal cases, including being one of the few attorneys to outright win a federal criminal jury trial (see *U.S. v. Darnell Thompson*, 06-cr-0440, N.D. ILL). I have also litigated federal intellectual property cases. See e.g. *Eva's Bridal LTD v. Halanick Enterprises, Inc.*, 07- cv-1668, N.D. ILL). And, I have litigated federal ERISA cases against unions for certain small black contractors. See e.g. *Iron Workers' Mid-America Pension Plan et al v. Morcom Construction Company*, (16 cv 2546, N.D. IL).
6. For the last five years, Shiller Preyar Law Offices has averaged more than \$800,000 annual in civil rights settlements and judgments, in addition to hundreds of thousands of dollars in other fees. Shiller Preyar has six staff attorneys, and three contract attorneys and several of counsel that it regularly works with. Shiller Preyar is housed within the West Side Justice Center which has an additional 4 attorneys that work on criminal defense and civil rights issues.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2018 in Chicago, Illinois.

A handwritten signature in black ink, appearing to read 'Brendan Shiller', written over a horizontal line.

Brendan Shiller